UNITED STATES BANKRUPTCY COURT

FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

THOMAS JAMES EDWARD SOUL,

CHAPTER 13

Debtor

CASE NO. 1-17-BK-04952-RNO

MOTION TO OPPOSE LIFTING OF AUTOMATIC STAY

DEBTOR HEREBY OPPOSES Plaintiff's Motion to remove the automatic stay. Debtor is scheduled to meet with an attorney on 6-27-18 to discuss all options available to his case.

THEREFORE, Debtor respectfully requests that any hearing date extend beyond the above listed meeting to enable Debtor to prepare an adequate defense and/or workable plan to continue his case. All pertinent matters relevant to the case will be addressed before the Court at that time.

Thomas James Edward Soul,

Debtor, Pro-se

2018 JUN 12 PM 2: 57

CERTIFICATE OF SERVICE

CASE NO. 1-17-BK-04952-RNO

MOTION TO OPPOSE LIFTING OF AUTOMATIC STAY

I HEREBY CERTIFY that a copy of the foregoing Motion to Oppose Lifting of Automatic Stay was sent on June 12th, 2018, via U.S. Mail and/or made available electronically to the following:

Charles J. DeHart, III

Trustee

8125 Adams Drive, Suite A

Hummelstown, PA 17036-8625

KML Law Group, P.C.

Attn: James C. Warmbrodt

701 Market Street, Suite 5000

Philadelphia, PA 19106

Thomas James Edward Soul,

Debtor, Pro-se